

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT L. BROWN,
JONATHAN WILLIAMS,
MARIO ABSTON, and
CARLETHA CARAWAY,

Defendants.

Cr. No. 08-20041

18 U.S.C. § 1951

18 U.S.C. § 924(c)

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FEB 05 2008

United States District Court
Western Tennessee

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

On or about January 19, 2008, in the Western District of Tennessee, the defendants,

----- ROBERT L. BROWN -----
and
----- JONATHAN WILLIAMS -----

being aided and abetted, each by the other, did unlawfully obstruct, delay, and affect commerce by robbery in that **ROBERT L. BROWN** and **JONATHAN WILLIAMS** did rob Burger King, 1985 E. Brooks Road, Memphis, Tennessee, a business then engaged in interstate commerce; in violation of Title 18, United States Code, Section 1951.

COUNT 2

On or about January 19, 2008, in the Western District of Tennessee, the defendants,

----- ROBERT L. BROWN -----
and
----- JONATHAN WILLIAMS -----

being aided and abetted, each by the other, did, during and in relation to a crime of violence, that is, "Robbery Affecting Commerce" in violation of Title 18, United States Code, Section 1951, knowingly use and carry a firearm; in violation of Title 18, United States Code, Section 924(c).

COUNT 3

On or about January 12, 2008, in the Western District of Tennessee, the defendants,

----- **ROBERT L. BROWN** -----
and
----- **JONATHAN WILLIAMS** -----

being aided and abetted, each by the other, did unlawfully obstruct, delay, and affect commerce by robbery in that **ROBERT L. BROWN** and **JONATHAN WILLIAMS** did rob Mrs. Winners Chicken, 1986 E. Brooks Road, Memphis, Tennessee, a business then engaged in interstate commerce; in violation of Title 18, United States Code, Section 1951.

COUNT 4

On or about January 12, 2008, in the Western District of Tennessee, the defendants,

----- ROBERT L. BROWN -----
and
----- JONATHAN WILLIAMS -----

being aided and abetted, each by the other, did, during and in relation to a crime of violence, that is, "Robbery Affecting Commerce" in violation of Title 18, United States Code, Section 1951, knowingly use and carry a firearm; in violation of Title 18, United States Code, Section 924(c).

COUNT 5

On or about January 6, 2008, in the Western District of Tennessee, the defendants,

----- ROBERT L. BROWN -----
and
----- JONATHAN WILLIAMS -----

being aided and abetted, each by the other, did unlawfully obstruct, delay, and affect commerce by robbery in that **ROBERT L. BROWN** and **JONATHAN WILLIAMS** did rob McDonalds, 7011 E. Shelby Drive, Memphis, Tennessee, a business then engaged in interstate commerce; in violation of Title 18, United States Code, Section 1951.

COUNT 6

On or about January 6, 2008, in the Western District of Tennessee, the defendants,

----- ROBERT L. BROWN -----
and
----- JONATHAN WILLIAMS -----

being aided and abetted, each by the other, did, during and in relation to a crime of violence, that is, "Robbery Affecting Commerce" in violation of Title 18, United States Code, Section 1951, knowingly use and carry a firearm; in violation of Title 18, United States Code, Section 924(c).

COUNT 7

On or about January 2, 2008, in the Western District of Tennessee, the defendants,

----- ROBERT L. BROWN -----
and
----- JONATHAN WILLIAMS -----

being aided and abetted, each by the other, did unlawfully obstruct, delay, and affect commerce by robbery in that **ROBERT L. BROWN** and **JONATHAN WILLIAMS** did rob Burger King, 2641 N. Hollywood, Memphis, Tennessee, a business then engaged in interstate commerce; in violation of Title 18, United States Code, Section 1951.

COUNT 8

On or about January 2, 2008, in the Western District of Tennessee, the defendants,

----- ROBERT L. BROWN -----
and
----- JONATHAN WILLIAMS -----

being aided and abetted, each by the other, did, during and in relation to a crime of violence, that is, "Robbery Affecting Commerce" in violation of Title 18, United States Code, Section 1951, knowingly use and carry a firearm; in violation of Title 18, United States Code, Section 924(c).

COUNT 9

On or about December 23, 2007, in the Western District of Tennessee, the defendants,

----- ROBERT L. BROWN -----
and
----- JONATHAN WILLIAMS -----

being aided and abetted, each by the other, did unlawfully obstruct, delay, and affect commerce by robbery in that **ROBERT L. BROWN** and **JONATHAN WILLIAMS** did rob Burger King, 1985 E. Brooks Road, Memphis, Tennessee, a business then engaged in interstate commerce; in violation of Title 18, United States Code, Section 1951.

COUNT 10

On or about December 23, 2007, in the Western District of Tennessee, the defendants,

----- **ROBERT BROWN** -----
and
----- **JONATHAN WILLIAMS** -----

being aided and abetted, each by the other, did, during and in relation to a crime of violence, that is, "Robbery Affecting Commerce" in violation of Title 18, United States Code, Section 1951, knowingly use and carry a firearm; in violation of Title 18, United States Code, Section 924(c).

COUNT 11

On or about September 23, 2007, in the Western District of Tennessee, the defendants,

----- JONATHAN WILLIAMS -----
and
----- MARIO ABSTON -----

being aided and abetted, each by the other, did unlawfully obstruct, delay, and affect commerce by robbery in that **JONATHAN WILLIAMS** and **MARIO ABSTON** did rob Mrs. Winners Chicken, 3243 Jackson, Memphis, Tennessee, a business then engaged in interstate commerce; in violation of Title 18, United States Code, Section 1951.

COUNT 12

On or about September 23, 2007, in the Western District of Tennessee, the defendants,

----- JONATHAN WILLIAMS -----
and
----- MARIO ABSTON -----

being aided and abetted, each by the other, did, during and in relation to a crime of violence, that is, "Robbery Affecting Commerce" in violation of Title 18, United States Code, Section 1951, knowingly use and carry a firearm; in violation of Title 18, United States Code, Section 924(c).

COUNT 13

On or about September 10, 2007, in the Western District of Tennessee, the defendants,

----- JONATHAN WILLIAMS -----
----- MARIO ABSTON -----
----- and -----
----- CARLETHA CARAWAY -----

being aided and abetted, each by the other, did unlawfully obstruct, delay, and affect commerce by robbery in that **JONATHAN WILLIAMS, MARIO ABSTON** and **CARLETHA CARAWAY** did rob McDonalds, 2062 Frayser Blvd., Memphis, Tennessee, a business then engaged in interstate commerce; in violation of Title 18, United States Code, Section 1951.

COUNT 14

On or about September 10, 2007, in the Western District of Tennessee, the defendants,

----- JONATHAN WILLIAMS -----
----- MARIO ABSTON -----
and
----- CARLETHA CARAWAY -----

being aided and abetted, each by the other, did, during and in relation to a crime of violence, that is, "Robbery Affecting Commerce" in violation of Title 18, United States Code, Section 1951, knowingly use and carry a firearm; in violation of Title 18, United States Code, Section 924(c).

COUNT 15

On or about September 8, 2007, in the Western District of Tennessee, the defendants,

----- **ROBERT L. BROWN** -----
and
----- **JONATHAN WILLIAMS** -----

being aided and abetted, each by the other, did unlawfully obstruct, delay, and affect commerce by robbery in that **ROBERT L. BROWN** and **JONATHAN WILLIAMS** did rob Pizza Hut, 4299 Elvis Presley, Memphis, Tennessee, a business then engaged in interstate commerce; in violation of Title 18, United States Code, Section 1951.

COUNT 16

On or about September 8, 2007, in the Western District of Tennessee, the defendants,

----- ROBERT L. BROWN -----
and
----- JONATHAN WILLIAMS -----

being aided and abetted, each by the other, did, during and in relation to a crime of violence, that is, "Robbery Affecting Commerce" in violation of Title 18, United States Code, Section 1951, knowingly use and carry a firearm; in violation of Title 18, United States Code, Section 924(c).

COUNT 17

On or about September 3, 2007, in the Western District of Tennessee, the defendants,

----- ROBERT L. BROWN -----
and
----- JONATHAN WILLIAMS -----

being aided and abetted, each by the other, did unlawfully obstruct, delay, and affect commerce by robbery in that **ROBERT L. BROWN** and **JONATHAN WILLIAMS** did rob McDonalds, 1352 E. Brooks Road, Memphis, Tennessee, a business then engaged in interstate commerce; in violation of Title 18, United States Code, Section 1951.

COUNT 18

On or about September 3, 2007, in the Western District of Tennessee, the defendants,

----- **ROBERT L. BROWN** -----
and
----- **JONATHAN WILLIAMS** -----

being aided and abetted, each by the other, did, during and in relation to a crime of violence, that is, "Robbery Affecting Commerce" in violation of Title 18, United States Code, Section 1951, knowingly use and carry a firearm; in violation of Title 18, United States Code, Section 924(c).

A TRUE BILL:

s/G.J. Foreperson

FOREPERSON

DATE: Dec. 5, 2008


UNITED STATES ATTORNEY